



## Illinois Department of Commerce and Economic Opportunity

Rod R. Blagojevich  
*Governor*

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*Director*

# Equal Employment Opportunity Compliance Review Report

## LWIA # 18 – Vermilion County Job Training Partnership

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Department of Commerce and Economic Opportunity  
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**Dates of Monitoring:**

September 28-30, 2004

**State Equal Opportunity Officer**

Erin Davis

**WIA Equal Opportunity Compliance Officers:**

Randy Boschulte

Tim Golemo

**Location of Site Monitoring:**

Vermilion County Job Training Partnership (VCJTP)

407 North Franklin Street Suite B

Danville, IL 61832

**LWIA 18 Staff Profile:**

At the time of the review, VCJTP employed 9 staff: two white males, six white females, and one black female.

Mr. Boschulte and Mr. Golemo met with VCJTP staff, Ms. Renee Polk, Executive Director, and Ms. Rebecca Boydston, LWIA EO Officer. Danville Area Community College (DACC) serves as the fiscal and administrative agent for the WIA funds, as well as the main training provider for the local area.

**Review:**

This compliance review is being conducted pursuant to 29 CFR Part 37 – Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998 and the WIA EO Policy Letter No. 00-07.

The equal opportunity compliance review covers:

- A comprehensive review of the nine elements of the Methods of Administration (MOA) for LWIA 18;
- The demographics of LWIA 18 through the use of United States Census, Illinois Department of Employment Security Workforce Availability Information, and the Illinois Workforce Development System (IWDS);
- An analysis of demographic and IWDS data to mathematically identify any significant differences or inequities;
- A facility compliance assessment of the architectural access and accessibility of services for Section 188 of WIA;
- An observation of intake and referral processes of WIA services;
- A review of the local complaint log for the past three years;
- Personal interviews with local office staff; and

- A random sample of applicant and registrant case files.

## **Methods of Administration Review**

The LWIA 18 narrative for each element must specially describe the policies, procedures, and systems that will guide how the local area will continue to meet the requirements of 29 CFR Part 37. The documentation (illustrations, extracts, copies, and samples of documents) that supports the narrative helps to support their guarantee of compliance.

The monitors reviewed the current MOA narrative and associated documentation of each element with the local EO Officer. Most of the necessary documentation for the MOA is either incomplete or requires revision to reflect current practices for LWIA 18.

**After conducting a thorough review of LWIA 18's MOA, the following documentation must be completed and incorporated into the MOA.**

### **Element 1 - Designation of the LWIA EO Officer**

The current regulations state that every recipient (except small recipients and service providers) must designate an Equal Opportunity Officer. To meet the minimum requirements to designate an EO Officer, the LWIA must affirmatively state the following in their MOA:

- The person appointed as an EO Officer must be eligible for the position, and must actually perform the responsibilities of the position. In order to be eligible for the position, the EO Officer must report directly to the person in charge of the day-to-day activities of the program.
- In a descriptive narrative, name each individual designated as a local-level EO Officer. Include position title, business address (including e-mail), and telephone # (including TTD/TTY number). 29 CFR 37.23
- Describe in detail the level within the organization (described in such terms as the individual's authority and position relative to the top of the hierarchy occupied by the EO Officer). 29 CFR 37.24
- Describe the Equal Opportunity Officer's duties, responsibilities and activities associated with the implementation of 29 CFR Part 37
- Describe the manner in which the recipient makes the identity of the EO Officer known to applicants, registrants, eligible applicants/registrants, participants, employees, and applicants for employment, as well as interested members of the public. 29 CFR 37.24
- Describe the level of staff and other resources available to the EO Officer to ensure that WIA Title I financially assisted programs and activities operates in a nondiscriminatory manner and complies with Section 188 and 29 CFR 37.26.
- Describe, in narrative form, the type and level of training the EO Officer has received and will receive to ensure that he or she is capable of fulfilling his or her responsibilities as an EO Officer, as well as the LWIA's plan for ensuring the EO Officer and their staff are sufficiently trained to maintain competency. 29 CFR 37.26

- Describe the identity, by name, title and organization, of the individual to whom the EO Officer reports regarding EO matters.
- Describe, in narrative form, the means by which the LWIA makes public the names, position titles and telephone numbers (including TTD/TTY numbers) of the EO Officer.
- Describe, in narrative form, a detailed description of any duties, other than WIA EO responsibilities, assigned to each EO Officer. 29 CFR 37.25

Additionally, the LWIA must provide a copy of the following:

- Documents that communicate, whether internally or externally, the EO Officer's name and contact information to registrants, applicants, participants, applicants for employment, employees, and interested members of the public.
- A written job description for EO Officer position.
- The organizational chart showing the organizational location of each EO Officer.
- The letter designating the EO Officer which affirmatively states that the EO Officer is a senior level employee who reports directly to the top official on EO matters.
- The EO budget and source of funds used to fulfill the nondiscriminatory obligations in 29 CFR 37.

## **Element 2 - Notice and Communication**

Notice and communication pertains to the recipient's responsibility to provide initial and continuing notice that it does not discriminate on any prohibited matter. The LWIA must establish an announcement and communication system that makes all members of the public aware of the LWIA's obligation to operate its programs and activities in a nondiscriminatory manner.

To meet the minimum notice and communication requirements, the LWIA must provide the following:

- The methods and frequency of dissemination of the EO Notice, including initial dissemination. 29.CFR 37.29
- A description of the means by which the Notice is made available to individuals with disabilities. 29 CFR 37.31 (b)
- A description of the means by which the LWIA ensures that recipients post the EO Notice. 29 CFR 37.33
- A description of the means by which a copy of the Notice is placed in the participant's file or where the files are maintained electronically, how the requirement is and will continue to be met. 29 CFR 37.31

- A description of the means by which the LWIA ensures recruitment brochures and other materials, routinely made available to the public, include the statements “Equal Opportunity Employer/Program” and that “auxiliary aids and services are available upon request” to individuals with disabilities. 29 CFR 37.34.
- A description the means by which program related information is published or broadcast in the news media to ensure equal opportunity. 29 CFR 37.34 (b)
- A description of the manner in which information is provided, along with a description of how the information is disseminated in languages other than in English.
- A description of the manner in which the LWIA ensures that persons of limited English speaking ability have access to its programs and activities on a basis equal to that of those who are proficient in English. 29 CFR 37.35
- A description of the manner in which, and the extent to which, orientations for registrants, applicants, eligible applicants/registrants, employees, applicants for employment, and members of the public include a discussion of the rights of such persons under WIA section 188 and 29 CFR 37.36.
- A description of the process that ensures communication with an individual with a disability is as effective as communication with others who do not have a disability. 29 CFR 37.29 (b)
- A description of the process the LWIA utilizes to both develop and communicate policies regarding nondiscrimination and Equal Opportunity. 29 CFR 37.25 (c)
- A description of how the LWIA conducts training regarding nondiscrimination and equal opportunity. 29 CFR 37.54 (d)

Additionally, the LWIA must provide a copy of the following:

- Each communication that instructs the LWIA’s recipients on how they are to comply with the requirements of 37.29 through 37.36 regarding Notice and communication.
- Any checklists of the contents of participant and employee files indicating the Notice requirement has been met. 29 CFR 37.31
- Any orientation agendas that include, as an agenda item, a discussion of EO and nondiscrimination under WIA section 188. 29 CFR 37.36
- Any agendas (and a list of dates) of past and proposed EO policy briefings and EO training. 29 CFR 37.25
- Each policy issuance or instruction that relates to WIA section 188 or 29 CFR 37.54 (d).
- The recruitment brochure and other material distributed to the public by a WIA Title I financially assisted recipient to evidence that each brochure and publication includes statements of “Equal Opportunity Employer/Program” and that “auxiliary aids and services are

available upon request to individuals with disabilities” along with telephone numbers for TTD/TTY access and/or telephone relay services. 29 CFR 37.34

### **Element 3 - Assurances**

As a condition to the award of financial assistance from the Department of Labor under Title I of WIA, the grantee assures that it will comply fully with the nondiscrimination and Equal Opportunity provisions of 29 CFR 37.

To meet the minimum requirements, the LWIA must provide the following assurances:

- A statement that the required assurances are incorporated into each grant, cooperative agreement, contract, or other arrangement where Federal financial assistance under Title I of WIA is made available. 29 CFR 37.20
- A statement that each grant applicant and each training provider seeking eligibility are able to provide programmatic and architectural accessibility for individuals with disabilities.
- A statement that the job training plans, contracts, and other similar agreements entered into by recipients are both nondiscriminatory and contain the required language regarding nondiscrimination and Equal Opportunity. 29 CFR 37.54
- Include all policies on which WIA Title 1 nondiscrimination and/or equal opportunity issues are developed and implemented.
- Include a copy of each directive that instructs individuals at the local level who are responsible for reviewing assurances, job training plans, contracts, and policies and procedures as to the requirements of and their duties under 29 CFR 37.20, 37.54
- Include copies of memos or directives to contact managers advising them to include the required assurance in the appropriate documents.
- Include copies of checklists or other guidelines used by contract specialists, attorneys, and others who review contracts and agreements that indicate that non-discrimination and equal opportunity are considered in the evaluation of such documents.
- Include a copy of procedures developed to review the ability of grant applicants, and training providers seeking eligibility, to comply with non discrimination and equal opportunity provisions of WIA and 29 CFR 37.
- Include a copy of each WIA EO assurance statement, the policy statement on sexual harassment and the policy statement on religious accommodation.

### **Element 4 -Universal Access**

Universal access means ensuring that an equivalent level of information regarding aid, benefits, services, and training is provided to all populations of eligible participants.

To meet the minimum requirements for compliance for Universal Access, the LWIA must be able to demonstrate the following:

- Describe how the LWIA has communicated the obligation of recipients to make efforts to broaden the composition of the pool for those considered for participation or employment in their programs and activities in an effort to include members of both sexes, of the various racial and ethnic groups and of various age groups as well as individuals with disabilities.
- Describe how recipients have made and will continue to make efforts to broaden the composition of those considered for participation or employment in their programs and activities.
- Describe how the LWIA monitors and evaluates the success of efforts to broaden the composition of those considered for participation and employment in their programs and activities.
- Include copies of targeting, out reach, and recruitment plans.
- Include a description of the criteria for determining priority service.
- Include copies of plans for one-stop delivery systems to expand the pool of those considered for participation or employment in their programs and by race/ethnicity, sex, disability status, and age.
- Provide samples of brochures, posters, public service announcements, computer screens displaying related information, and other publicity materials.

#### **Element 5 - Compliance with Disability Requirements and WIA Section 188**

Section 188 of WIA bars discrimination on the basis of disability in programs, services, and employment (including the application process for any of these). Under Section 188, persons with disabilities must also be provided with reasonable accommodations and modifications for their disabilities. The section also requires that individuals with disabilities be given services alongside (not segregated from) people without disabilities, unless the program or activity providing services performs an individualized assessment of a particular individual with a disability and concludes that the individual needs special, segregated services.

To meet the minimum requirements for compliance of WIA disability regulations, the LWIA must be able to demonstrate the following:

- Describe how the LWIA meets their obligation not to discriminate on the basis of disability.
- Describe how the LWIA provides reasonable accommodation for individuals with disabilities.
- Describe how the LWIA provides reasonable modification of policies, practices, and procedures.
- Describe how the LWIA provides architectural accessibility for individuals with disabilities

- Describe how the LWIA provides for and adheres to a schedule to evaluate job qualifications to ensure that the qualifications do not discriminate on the basis of disability.
- Describe how the LWIA limits pre-employment/employment medical inquiries to those permitted by and in accordance with WIA section 188, Section 504, the American with Disabilities Act of 1990, and their implementing regulations.
- Describe how the LWIA ensures the confidentiality of medical information provided by registrants, applicants, eligible applicants/registrants, participants, employees, and applicants for employment.
- Describe how the LWIA administers their WIA Title I financially assisted programs and activities so that each individual with a disability participates in the most integrated setting appropriate to that individual.
- Describe how the LWIA is able to communicate with persons with disabilities as effectively as with others.
- Include procedures by which the availability of reasonable accommodation and reasonable modification are made known to persons with disabilities, and the procedures for making and resolving such requests.
- Include the procedures by which persons with disabilities are assured of participation in programs and activities in as integrated setting as possible.
- Include procedures by which the LWIA ensures that communication with persons with disabilities is as effective as communication with others.
- Include procedures by which the LWIA ensures that the programs and activities operated by its WIA Title I recipients are architecturally and programmatically accessible to individuals with disabilities.
- Include evaluations conducted to determine the programmatic or architectural accessibility of a WIA Title I financially assisted program or activity and the status of any corrective actions taken by the recipient involved.
- Include copies of publications and agendas for any training conducted for recipient staff that is intended to raise awareness of disability issues.

## **Element 6 - Data and Information Collection and Maintenance**

Each recipient must have established a data collection and maintenance system that allows for a statistical/quantifiable analysis of the recipient's compliance with WIA equal opportunity policy. Regulatory and discretionary data information must be provided to the State EO Officer and the Director of the Civil Rights Center upon request. All data collected must also be maintained in a confidential manner.

To meet the minimum compliance for data information and collection requirements, the LWIA must be able to demonstrate the following:

- Describe the process by which recipients collect and maintain records on applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment.
- Describe the process by which recipients record race/ethnicity, sex, age, and disability status of each applicant, registrant, eligible applicant/registant, participant, terminee, employee, and applicant for employment.
- Describe how recipients treat records, particularly those containing medical information, in a manner that ensures confidentiality (i.e. medical information must be maintained in a separate file in a separate location).
- Describe how the LWIA EO Officer maintains a log of complaints filed that allege discrimination on one or more of the bases prohibited by WIA section 188.
- Include the complaint log for a period of three years.
- Describe how grant applicants and recipients notify the CRC Director of administrative enforcement actions and lawsuits brought against them that allege discrimination on one or more of the bases prohibited by WIA section 188.
- Include instructions to recipients within the LWIA regarding information collection, access to records, and maintenance of records.
- Provide samples of each policy issuance that discusses ensuring the confidentiality of demographic information regarding individuals.
- Provide samples of the formats and instructions, in hard copy and electronic file forms, for complaint logs used by the LWIA and its recipients to track complaints that allege a violation of WIA section 188 or 29 CFR Part 37.

## **Element 7 - Monitoring**

The LWIA is required to establish a system and to periodically monitor their recipients' compliance with implementation of the Nondiscrimination and Equal Opportunity Provisions of WIA.

To meet the minimum compliance for monitoring recipients, the LWIA must be able to demonstrate the following:

- The LWIA must describe how their recipients (training providers) comply with the administrative obligations of 29 CFR 37 including, but not limited to: providing assurances, appointing Equal Opportunity Officers, posting notices, collecting and maintaining data, providing universal access, procedures for processing complaints.
- Describe the process by which the LWIA EO Officer is assigned responsibilities such as conducting EO monitoring/evaluation reviews of applicants and the recipients of WIA Title I financial assistance (including monitoring assurances and programmatic and architectural accessibility).

- Describe the process by which the LWIA imposes sanctions and corrective actions for violations noted by a recipient during its monitoring reviews.
- Describe how the LWIA ensures policy development, communication, and training are carried out.
- Describe how the LWIA ensures that their programs and activities are operating in a non-discriminatory manner and ensuring equal opportunity including but not limited to conducting analyses, by race, ethnicity and sex, of program and employment activity, including but not limited to rates of application, placement, & termination to determine if significant differences exist and follow-up monitoring to determine the cause of any such differences, through the analysis of records of individual registrants, applicants, eligible applicants/registrants, employees and applicants for employment, interviews, and other appropriate techniques.
- Describe the procedure for reviewing recipients' policies and procedures to ensure that the policies and procedures do not violate the prohibitions contained in 29 CFR 37.5 through 37.10.
- Describe the written reports prepared for each review. These reports must provide, among other things, the results of the monitoring review that will be made available to the recipients reviewed.
- Describe the involvement of the EO Officers in conducting reviews. Where individuals other than the EO Officer carry out EO monitoring, the narrative should provide the names, titles, and organizations of those persons.
- Describe the procedure for determining which recipients are to be reviewed, the frequency of the reviews of recipients, and the number of recipients to be reviewed per year.
- Include a copy of the schedule of reviews and criteria for targeting recipients for review.
- Provide the monitoring instruments used by the local level staff to monitor recipient EO activities.
- Include the policy issuances and procedural guidance regarding monitoring reviews and recipient evaluations.
- Provide a representative sample of reports of monitoring reviews, including findings resulting from reviews and the status of follow-up activities.

## **Element 8 - Complaint Processing Procedures**

The LWIA must adopt and publish procedures for processing complaints by a WIA recipient alleging discrimination. These procedures must provide the complainant with the option to file with the recipient, the State, or directly with the USDOL Civil Rights Center. The LWIA must include a statement describing the process it used to develop and publish complaint procedures.

At a minimum, the LWIA must include the following in its Complaint Processing Procedures:

- Issuance of a written Notice of Final Action within 90 days of the date on which the complaint is filed. A written notice to the complainant must contain an acknowledgement that the recipient has received the complaint, and a notice that the complainant has the right to be represented in the complaint process.
- Language in written statement, provided to the complainant that contains a list of the issues raised in the complaint, and for each issue, a statement whether the recipient will accept the issue for investigation or reject the issue, and the reasons for each rejection.
- A period for fact-finding or investigation of the circumstances underlying the complaint.
- A period during which the recipient attempts to resolve the complaint. The methods available to resolve the complaint must include alternative dispute resolution.
- A written Notice of Final Action, provided to the complainant and the respondent, within 90 days of the date on which the complaint was filed, that contains, for each issue raised in the complaint either a statement of the recipient's decision on the issue and an explanation of the reasons underlying the decision, or a description of the way the parties resolved the issue.
- A statement that the complainant has the right to file a complaint with CRC within 30 days of the date on which the Notice of Final Action is due if: 1) he or she is dissatisfied with the recipient's final action on the complaint; or 2) if there is no Notice of Final Action within 90 days of the date the complaint is filed.
- A description of the procedures to be followed if the complaint is filed more than 180 days after the date of the alleged violation.
- All instructions to recipients who must follow the established procedures.
- A copy of the instrument used to inform recipients of the complaint procedures and directing recipients as to their use.
- A copy of the alternative dispute resolution procedures, if not included with complaint processing procedures.

## **Element 9 - Corrective Actions and Sanctions**

Corrective action is required from a recipient when there is probable cause to believe a violation of the nondiscrimination and equal opportunity requirements of WIA has occurred. The violation may be identified as a result from either a monitoring review or a discrimination complaint.

To meet the minimum compliance for establishing corrective actions and applying sanctions, if needed, the LWIA must be able to demonstrate the following to ensure that resolution of any non-compliance can be enforced:

- Creation and adherence to the procedures for follow-up monitoring to ensure that commitments to take corrective action and remedial action are fulfilled.

- Creation and maintenance of reports required from the violating recipient regarding actions to correct the violations.
- Creation and adherence to the sanction procedures to be followed where voluntary compliance cannot be achieved.
- Provision and retention of copies of any policy memorandum, directive, or instrument used to inform recipients of the LWIA's corrective actions and sanctions.

## **LWIA # 18 Demographic Profile**

The purpose of this demographic review is to evaluate the effectiveness of the Equal Opportunity programs and processes to:

- Detect areas of potential discrimination;
- Identify any difference in treatment accorded applicants, whether intentional or unintentional; and
- Make recommendations for corrective action.

In order to determine if recipients for WIA services are being treated equitably, it is first important to understand the target populations with the civilian labor force. The following data from the Illinois Department of Employment Security (IDES) Economic Information and Analysis Division depicts the workforce availability for Vermillion County.

**Table 1**

|                                   | <b>US Census</b> | <b>Labor Force</b> | <b>Employed</b> | <b>Unemployed</b> | <b>Unemployment %</b> |
|-----------------------------------|------------------|--------------------|-----------------|-------------------|-----------------------|
| <b>Total Population</b>           | 83,919           | 37,418             | 34,288          | 3,130             | 8.4%                  |
| White                             | 72,032           | 33,956             | 31,466          | 2,490             | 7.3%                  |
| Black or African American         | 8,882            | 2,704              | 2,136           | 568               | 21.0%                 |
| American Indian and Alaska Native | 201              | 57                 | 55              | 2                 | 3.5%                  |
| Asian*                            | 498              | 258                | 253             | 5                 | 1.9%                  |
| Hispanic or Latino (of any race)  | 2,504            | 819                | 718             | 105               | 12.8%                 |
| Some other Race                   | 1,212            | 443                | 378             | 65                | 14.7%                 |
| Male                              | 41,291           | 19,616             | 18,001          | 1,615             | 8.2%                  |
| Female                            | 42,628           | 17,802             | 16,287          | 1,515             | 8.5%                  |

**Sources: U.S. Census Bureau 2000 Redistricting Data (Public Law 94-171) Summary File, Matrices PL1, PL2, PL3, and PL4. Unemployment Data from Illinois Department of Employment Security, Economic Information and Analysis Division, Workforce Availability Information 2004 ([www.ILWorkInfo.com](http://www.ILWorkInfo.com))**

\* IDES Asian unemployment data includes Native Hawaiian and other Pacific Islander

As shown in Table 1, the Black or African American population has the highest rate of unemployment (21%) in Vermillion County, far exceeding the total population unemployment rate at 8.4%. The second highest unemployment rate that is identifiable is Hispanic at 12.8%. The Asian population had the lowest unemployment rate at 1.9%. Male and female unemployment rates are relatively similar at 8.2% and 8.5% respectively.

**Based on the information from Table 1, the largest target audience for LWIA to market outreach programs to should include Black or African American and Hispanic since their proportion of unemployment is higher than the total population.**

Applicant and registrant data was extracted from the Illinois Workforce Development System (IWDS), which is the data collection system utilized by the State of Illinois Bureau of Workforce Development. Through the use of IWDS, a Target Population Summary report was generated on 11/04/2004 for a reporting period from 7/01/03 to 6/30/04. IWDS data was further broken down by race/ethnicity and sex for applicants, registrants, new registrants, and exiters [**Appendix I**].

The following data was generated from the Illinois Workforce Development System Target Population Report Summary:

**Table 2**

|  | <u>Applicants</u> | <u>%</u> | <u>Registrants</u> | <u>%</u> | <u>New Registrants</u> | <u>%</u> |
|--|-------------------|----------|--------------------|----------|------------------------|----------|
| <b>Total Population</b>                      | 117               |          | 91                 |          | 18                     |          |
| White  | 58                | 49.6%    | 58                 | 63.7%    | 9                      | 50.0%    |
| Black or African American                    | 56                | 47.9%    | 31                 | 34.1%    | 9                      | 50.0%    |
| American Indian and Alaska Native            | 1                 | 0.9%     | 1                  | 1.1%     | 0                      | 0.0%     |
| Asian  | 0                 | 0.0%     | 0                  | 0.0%     | 0                      | 0.0%     |
| Native Hawaiian and other Pacific Islander   | 0                 | 0.0%     | 1                  | 1.1%     | 0                      | 0.0%     |
| Hispanic or Latino (of any race)             | 1                 | 0.9%     | 5                  | 5.5%     | 0                      | 0.0%     |
| Male   | 48                | 41.0%    | 34                 | 37.4%    | 7                      | 38.9%    |
| Female                                       | 69                | 59.0%    | 57                 | 62.6%    | 11                     | 61.1%    |
| Disabled                                     | 6                 | 5.1%     | 0                  | 0.0%     | 0                      | 0.0%     |
| Individual w/disability Affecting Employment | 0                 | 0.0%     | 1                  | 1.1%     | 0                      | 0.0%     |
| Developmental Disability                     | 3                 | 2.6%     | 0                  | 0.0%     | 0                      | 0.0%     |
| Learning Disabled                            | 14                | 2.0%     | 0                  | 0.0%     | 0                      | 0.0%     |
| LEP (Limited English Proficient)             | 0                 | 0.0%     | 0                  | 0.0%     | 0                      | 0.0%     |

### **Male and Female Applicants and New Registrants**

In table 2, there were 117 total applicants that applied for WIA job training services from 7/01/03 to 6/30/04 in LWIA 18. Of the 117 applicants, only 18 were registered in training services (about 15.3% of the total applicants). Seven males (39.9%) were selected from 48 applicants and eleven females (61.1%) were selected from 69 applicants.

**The proportion of male and female applicants and new registrants is acceptable considering the female unemployment rate is slightly higher than the male unemployment rate. LWIA 18 should continue its efforts to ensure that an equivalent level of information regarding services and training is provided to both male and female populations eligible for participation.**

### **Racial/Ethnic Group Applicants and New Registrants**

New registrants from the Black or African American and White populations were equally registered at 50% from a group of 56 and 58 applicants respectively. As there is an equal distribution between White and African American applicants, there statistically is a disparity of training opportunities for African American (remember: African American unemployment rate is 21%, which is considerably higher than the White unemployment rate).

Only one Hispanic applied for training services in LWIA 18, even though the Hispanic population has an unemployment rate over 12%. The single Hispanic applicant was not accepted as a new registrant. Only five Hispanic registrants are currently participating in the LWIA 18's training services.

**Because of the higher rates of unemployment and the small applicant pool, LWIA 18 needs to better include the Black or African American and Hispanic populations in their targeted**

**outreach plans. The outreach plan needs to be integrated in LWIA 18's Methods of Administration to include efforts to broaden the composition of the pool for those considered for participation or employment in their programs and activities.**

### **Disabled Applicants and New Registrants**

Of the 23 applicants (19.6%) who identified themselves as having some form of disability, none were accepted as new registrants for training services. The largest segment of the disabled population (14) was those who identified themselves with a learning disability.

**Considering that almost 20% of LWIA 18's applicant population identified themselves as having a form of disability, and none of which were accepted as new registrants, LWIA 18 needs to increase efforts to broaden the composition of disabled applicants considered for participation and employment in their programs and activities.**

### **Exiters, Entered Employment and Average Wage at Placement**

Information from the Illinois Workforce Development System Target Population Report Summary depicts the total number of exiters or terminations included below in **Table 3**.

**Table 3**

|  | <b><u>Exiters</u></b> | <b><u>%</u></b> | <b><u>Entered Employment</u></b> | <b><u>%</u></b> | <b><u>Average Wage at Placement</u></b> |
|--|-----------------------|-----------------|----------------------------------|-----------------|---|
| <b>Total Population</b>                      | 47                    |                 | 26                               |                 | \$10.47                                 |
| White  | 32                    | 68.1%           | 21                               | 80.8%           | \$11.16                                 |
| Black or African American                    | 13                    | 27.7%           | 4                                | 15.4%           | \$8.94                                  |
| American Indian and Alaska Native            | 1                     | 2.1%            | 1                                | 2.1%            | \$2.20                                  |
| Asian  | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |
| Native Hawaiian and other Pacific Islander   | 1                     | 2.1%            | 0                                | 0.0%            | \$0.00                                  |
| Hispanic or Latino (of any race)             | 4                     | 8.5%            | 4                                | 8.5%            | \$8.92                                  |
| Male   | 22                    | 46.8%           | 13                               | 50.0%           | \$9.46                                  |
| Female                                       | 25                    | 53.2%           | 13                               | 50.0%           | \$14.48                                 |
| Disabled                                     | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |
| Individual w/disability Affecting Employment | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |
| Developmental Disability                     | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |
| Learning Disabled                            | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |
| LEP (Limited English Proficient)             | 0                     | 0.0%            | 0                                | 0.0%            | \$0.00                                  |

In Table 3, of the 47 participants exiting from training services, 26 or 55.3% successfully entered employment at an average wage of \$10.47.

### **Male and Female Exiters**

From the total population, 22 males and 25 females exited the program, and 13 of each entered employment. Female's average wage at placement was 35% greater than males at \$14.48 as opposed to males at \$9.46.

## **Racial/Ethnic Group Exiters**

The White population had the highest rate of exiters (32 participants or 68.1%) and the highest rate of employment (21 successfully employed or 80.8%). The White population also had the highest average wage at placement at \$11.16. In comparison, the Black or African American population exited 13 participants (27.7% of total) and only four entered employment (15.4%) with an average wage of \$8.94.

The Hispanic population exited four participants (8.5% of total) with all four entering employment with an average wage of \$8.92.

**The statistical data shows that the White population is still achieving the highest rate of employment after training, despite the highest rates of unemployment for Black or African American and Hispanic populations. LWIA needs to reevaluate the success of efforts to broaden the composition of those considered for participation and success of employment in their training programs and activities. LWIA 18 needs to develop and maintain targeting, outreach, and recruitment plans to better serve those segments of the populations that are unemployed.**

## **Disabled Exiters**

There were *no* participants that exited the program identified as disabled.

**Much improvement is needed in helping to broaden the composition the disabled applicants considered for participation in training services. LWIA needs to adopt and maintain criteria for determining priority service, as 20% of the total applicant pool tried to receive training services.**

## **Selection Rate and Statistical Significance**

To test for statistical significance, the 80% rule was used to determine the level of equity of services delivered to applicants and registrants of LWIA 18. The 80% (or 4/5<sup>th</sup>) Rule is derived from the Uniform Guidelines on Employee Selection Procedures (UGESP). UGESP was jointly published by the Department of Labor, the Department of Justice, the Equal Opportunity Commission and the Office of Personnel Management. The Guidelines were developed in light of the Supreme Court case, *Griggs v. Duke Power*, 401 U.S. 424 (1971), which recognized that a selection procedure, while neutral on its face, could be discriminatory if it had an adverse impact on the employment opportunities of members of different race, sex, or ethnic groups.

When using the 80% Rule, adverse impact is said to exist when the selection rate of any race, sex, or ethnic group is less than 80% of the most favorable selection rate. (Keep in mind at this point of the analysis, adverse impact does not mean discrimination.)

$$\text{White Selection Rate} = \frac{9 \text{ new registrants}}{58 \text{ Applicants}} = 15.5\%$$

$$\text{Black or African American Selection Rate} = \frac{9 \text{ new registrants}}{56 \text{ Applicants}} = 16.1\%$$

|  |   |   |
|--|---|---|
| American Indian/Alaska Native Selection Rate | = | $\frac{0 \text{ new registrants}}{1 \text{ Applicant}} = 0.0\%$ |
| Asian Selection Rate                         | = | $\frac{0 \text{ new registrants}}{0 \text{ Applicant}} = 0.0\%$ |
| Native Hawaiian and other Pacific Islander   | = | $\frac{0 \text{ new registrants}}{0 \text{ Applicant}} = 0.0\%$ |
| Hispanic Selection Rate                      | = | $\frac{0 \text{ new registrants}}{1 \text{ Applicant}} = 0.0\%$ |

**The group with the most favored rate is Black or African American (16.1% acceptance rate) as no other population group had any new registrants.**

### **Adverse Impact Calculation**

While policies governing decision-making may be neutral, they may still be considered discriminatory if they have a discriminatory effect upon the employment, training, or other such opportunities of an identifiable group. This discrimination theory, called “*disparate effect*,” also derives from *Griggs v Duke Power* and may be revealed from the adverse impact calculation utilizing the 80% (or 4/5ths rule). Disparate impact is defined as a “substantially different rate of selection in hiring, promotion, or other employment decision which works to the disadvantage of members of a race, sex or ethnic group. While this *substantial rate* can be determined in a variety of ways, the Bureau of Workforce Development utilizes the 80% or 4/5ths rule as a practical means of determining adverse impact.

To calculate for adverse impact, all other population groups are divided by the highest selection rate (Black or African American):

|  |   |                         |   |       |                       |
|--|---|-------------------------|---|-------|-----------------------|
| <u>White Acceptance Rate</u>                               | = | $\frac{15.5\%}{16.1\%}$ | = | 96.3% |                       |
| Black Acceptance Rate                                      |   |                         |   |       |                       |
| <u>American Indian &amp; Alaska Native Acceptance Rate</u> | = | $\frac{0.0\%}{16.1\%}$  | = | 0.0%  | <b>Adverse Impact</b> |
| Black Acceptance Rate                                      |   |                         |   |       |                       |
| <u>Asian Acceptance Rate</u>                               | = | $\frac{0.0\%}{16.1\%}$  | = | 0.0%  | <b>Adverse Impact</b> |
| Black Acceptance Rate                                      |   |                         |   |       |                       |
| <u>Native Hawaiian/Pacific Islander Acceptance Rate</u>    | = | $\frac{0.0\%}{16.1\%}$  | = | 0.0%  | <b>Adverse Impact</b> |
| Black Acceptance Rate                                      |   |                         |   |       |                       |
| <u>Hispanic Acceptance Rate</u>                            | = | $\frac{0.0\%}{16.1\%}$  | = | 0.0%  | <b>Adverse Impact</b> |
| Black Acceptance Rate                                      |   |                         |   |       |                       |

The White population was the only group that had a greater than 80% favorable selection rate. The other populations did not have any new registrants in the program, and therefore, the selection rate was 0%. Based on the very low unemployment levels of Asian, American Indian/Alaska Native, and

Native Hawaiian/Pacific Islander, the pool of potential applicants is limited, thereby affecting low participant levels.

Only one applicant from the Hispanic population, which accounts for 12.8% of the unemployment, applied for services. Even though the Hispanic population typically has seasonal and migrant workers, this population still needs to be included in VCJTP's marketing and outreach programs.

**In conclusion, other than the White and Black or African American populations, no other ethnic or racial group had applicants that were accepted and registered in training services. Based on these 80% rule, American Indian/Alaska Native, Asian, Native Hawaiian/Pacific Islander, and Hispanic populations were statistically adversely impacted. LWIA 18 needs to include these groups in their universal access and target outreach plans to ensure that these groups are not adversely impacted. There appears to be a disparate effect considering that only two population groups were serviced as new registrants.**

## **Compliance assessment for Section 188 of WIA**

Section 188 of WIA ensures nondiscrimination and equal opportunity for various categories of persons, including persons with disabilities, who apply for and participate in programs and activities operated by recipients of WIA Title I financial assistance. Illinois' MOA outlines the policies, procedures, and systems that the State has designed and put in place in order to provide a reasonable guarantee that the State and its recipients will comply with the nondiscrimination and equal opportunity requirements of WIA Section 188 and its implementing regulations.

In demonstrating compliance with Section 188, a recipient that has received WIA financial assistance from a State must show that it adheres to the policies, procedures, and systems described in its State's WIA MOA. The Accessibility Report [Appendix II] was utilized to address how the LWIA grant recipient is complying with, and implementing, the applicable Federal requirements for persons with disabilities. Page numbers have been included for easy reference in Appendix II. Photographs of non-compliance areas are included in Appendix III.

The following areas of non-compliance were:

1. There is no sidewalk on the side of the street closest to the building by the front door. (p. 2)
2. The Front Exterior and Interior Entrance Doors do not comply with the push/ pull requirements of the ADA Standards for Accessible Design (4.13.11). Exterior doors should have a push/pull of 8.5 lbs. Interior doors should have a push/pull of 5 lbs. Both of the front door push/pull range from 9.1 to 30 lbs push/pull.
3. Men and Women Bathroom Doors do not comply with the push/pull requirements of ADA Standards for Accessible Design (4.13.11). Pull force range from 9.3 lbs in the men's restroom to 17.1 lbs in the women's restroom. Push force in the men's restroom was 11 lbs. and the women's restroom was 18 lbs.
4. Drain pipes under men and women's sink exposed. They should be insulated. (p. 10)
5. Public Telephones: There were no phones w/TTY available for public use. (p.11)
6. Signs and Identification – no signs for passenger board or accessible signage at entrance. (p. 11)
7. Public rest room not appropriately signed; should be 5' from the floor (p. 11)
8. Work Stations have inadequate knee clearance (they should be at least 27" from the ground). (p. 12)
9. Protruding Objects – Fire extinguisher – 6" protruding from T intersection near the utility closet. (p. 12)
10. Information Access – No alternate formats readily available. Still need audio and Braille print for orientation materials. (p. 12)
11. Audio & Video Materials – Video materials not captioned; required for future purchases. (p.13)
12. Video materials are not descriptive Audio equipped. (p. 13)
13. Closed captioned TV not visible to public; 20" TV locked in cabinet in conference room. (p. 13)
14. Audio/Visual equipment controls not adequately labeled; no large print or Braille labels are available on A/V controls. (p. 13)
15. No audio players are present in the resource area. (p. 13)
16. No Computer can readily read text on the monitor and convert the text to voice. Additional software is necessary. (p. 15)
17. There are no Braille printers in the IETC. (p. 15)
18. There are no portable assistive listening devices available. (p. 15)
19. The IETC does not have a list available auxiliary aids and services for communications, and assistive technology devices. (p. 16)

20. Vermilion County IETC needs to post information regarding availability of communications aids and services. The employees must become more knowledgeable about these aids and services. (p. 17)
21. The One-Stop Center needs to identify various sources for certified sign language interpreters. Staff needs to be trained and aware of how to use these services. (p. 17)
22. US Department of Labor Job Accommodation Network marketing materials need to be posted more widely. (p. 17)
23. The outreach materials should include a list of auxiliary aids and services in accessible formats. (p. 17)
24. Tag line communications should list TDD /TTY numbers. (p. 17)

### **Review of the local complaint log**

A three-year local complaint log still needs to be created by VCJTP.

### **Personal interviews with local office staff**

A DCEO site review questionnaire was used to assess the local office staff's knowledge of various types of client services, which may be utilized to help aid the disabled. Personal interviews were conducted with four VCJTP staff to identify any additional training or further instruction that could aid in delivering services to the disabled more effectively.

In general, the findings from the results were as follows:

1. Staff was familiar with the Equal Opportunity is the Law Notice, complaint procedures, and nondiscrimination policies.
2. Staff was familiar with services to assist clients with disabilities (i.e. auxiliary aids for the hearing, verbal, and visual impaired).
3. Staff never utilized or needed to utilize interpreters for clients with Limited English Proficiency (LEP) in the last 12 months.
4. Physical office accessibility was a concern since the entrance to the building is not accessible.

### **Applicant and registrant case files**

A thorough review revealed that medical examination reports were included in the applicant and registrant case files. VCJTP does not have in place a written policy regarding who has access to medical information. For example, all non-medical records are kept in a separate place from records that contain medical information. Medical records might include insurance application forms as well as health certificates and results from physical exams [29 CFR 32.15; 29 CFR 37.10(d); 29 CFR 1630.14]. Any information obtained regarding the medical condition or history of the applicant shall be collected and maintained on separate forms and in separate medical files and be treated as a confidential medical record.

## Appendix I –

### Statistical Breakout of Applicant Characteristics

| Applicant Characteristics                         |            |         |
|---|------------|---------|
|   | Applicants | Percent |
| White Male  | 25         | 21.4    |
| White Female                                      | 33         | 28.2    |
| Black Male  | 21         | 17.9    |
| Black Female                                      | 35         | 29.9    |
| Hispanic Male                                     | 0          | 0       |
| Hispanic Female                                   | 1          | 0.9     |
| American Indian and Alaskan Native Male           | 1          | 0       |
| American Indian and Alaskan Native Female         | 0          | 0       |
| Asian Male  | 0          | 0       |
| Asian Female                                      | 0          | 0       |
| Native Hawaiian and other Pacific Islander Male   | 0          | 0       |
| Native Hawaiian and other Pacific Islander Female | 0          | 0       |
| Males 40 and older                                | 8          | 6.8     |
| Females 40 and older                              | 17         | 14.5    |
| Total Minorities                                  |            | 92      |

**\*As of 10/29/04**

### Statistical Breakout of Registrant Characteristics

| Registrant Characteristics                        |             |         |
|---|-------------|---------|
|   | Registrants | Percent |
| White Male  | 24          | 26.1    |
| White Female                                      | 34          | 36.9    |
| Black Male  | 10          | 9.2     |
| Black Female                                      | 22          | 23.9    |
| Hispanic Male                                     | 3           | 3.3     |
| Hispanic Female                                   | 2           | 2.2     |
| American Indian and Alaskan Native Male           | 0           | 0       |
| American Indian and Alaskan Native Female         | 1           | 1.1     |
| Asian Male  | 0           | 0       |
| Asian Female                                      | 0           | 0       |
| Native Hawaiian and other Pacific Islander Male   | 0           | 0       |
| Native Hawaiian and other Pacific Islander Female | 1           | 1.1     |
| Males 40 and older                                | 8           | 8.7     |
| Females 40 and older                              | 12          | 13.0    |
| <b>Total Minorities</b>                           | <b>68</b>   |         |

**\*As of 10/29/04**

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### Statistical Breakout of New Registrant Characteristics

| New Registrant Characteristics                    |             |         |
|---|-------------|---------|
|   | Registrants | Percent |
| White Male  | 3           | 16.7    |
| White Female                                      | 6           | 33.3    |
| Black Male  | 4           | 22.2    |
| Black Female                                      | 5           | 27.8    |
| Hispanic Male                                     | 0           | 0       |
| Hispanic Female                                   | 0           | 0       |
| American Indian and Alaskan Native Male           | 0           | 0       |
| American Indian and Alaskan Native Female         | 0           | 0       |
| Asian Male  | 0           | 0       |
| Asian Female                                      | 0           | 0       |
| Native Hawaiian and other Pacific Islander Male   | 0           | 0       |
| Native Hawaiian and other Pacific Islander Female | 0           | 0       |
| Males 40 and older                                | 3           | 16.7    |
| Females 40 and older                              | 3           | 16.7    |
| <b>Total Minorities</b>                           | 15          |         |

**\*As of 10/29/04**

### Statistical Breakout of Exiter Characteristics

| Exiter Characteristics                            |         |         |
|---|---------|---------|
|   | Exiters | Percent |
| White Male  | 16      | 37.2    |
| White Female                                      | 15      | 34.9    |
| Black Male  | 5       | 11.6    |
| Black Female                                      | 7       | 16.3    |
| Hispanic Male                                     | 3       | 6.9     |
| Hispanic Female                                   | 1       | 2.3     |
| American Indian and Alaskan Native Male           | 0       | 0       |
| American Indian and Alaskan Native Female         | 0       | 0       |
| Asian Male  | 0       | 0       |
| Asian Female                                      | 0       | 0       |
| Native Hawaiian and other Pacific Islander Male   | 0       | 0       |
| Native Hawaiian and other Pacific Islander Female | 0       | 0       |
| Males 40 and older                                | 4       | 9.3     |
| Females 40 and older                              | 3       | 6.9     |
| <b>Total Minorities</b>                           | 27      |         |

**\*As of 10/29/04**

## SECTION 188 ACCESSIBILITY REPORT

Danville One-Stop  
407 N. Franklin Street  
Danville, IL 61832

## PHYSICAL ACCESSIBILITY PARKING

| Number of off-street parking spaces available | Minimum Number of accessible spaces  | REMARKS   |
|---|--|---|
| 1 to 25                                       | 1  | <b>187 total parking spaces</b><br><b>16 total spaces designated as reserved for people with disabilities:</b><br><b>8 spaces (West side of building)</b><br><b>4 (directly in front of IETC)</b><br><b>4 (in front of adjacent Church)</b> |
| 25 to 50                                      | 2  |   |
| 51 to 75                                      | 3  |   |
| 76 to 100                                     | 4  |   |
| 101 to 150                                    | 5  |   |
| 151 to 200                                    | 6  |   |
| 201 to 300                                    | 7  |   |
| 301 to 400                                    | 8  |   |
| 401 to 500                                    | 9  |   |
| 501 to 1000                                   | 2% of total number   |   |
| Over 1000                                     | 20 plus 1 for each 100 over 1000   |   |
| <b>Proximity to the Facility</b>              | Accessible parking spaces shall be located on the shortest possible accessible route to an accessible entrance of the building   | <b>36 ½ feet</b>  |
| <b>Signage</b>                                | Each accessible parking space shall be equipped with a sign which meets the requirements of the R7-8 sign (US DOT Standard) and a R7-I101 sign designating the appropriate fine  | 12" Standard R7-8 sign<br>Below is R7-I101 sign designating the appropriate fine  |
| <b>Location of Signage</b>                    | Signage shall be affixed to a wall or to a post permanently mounted in the ground and located in the center of the 16' space no further than 5' from the front of the accessible space. The minimum height to the bottom of the fine sign shall be 4". | <b>8 ½ ft. from center – signage is in the middle of the isle</b><br><br><b>3" setback</b>  |

|  |   |  |
|--|---|--|
| <b>Width of Vehicle Space/Access Aisle</b> | Accessible spaces shall be 16' wide with either an 11' vehicle space and a 5' access aisle or an 8' vehicle space and an 8' access aisle. Access aisles shall blend to a common level with an accessible route. | <b>Vehicle Space closest to front access door: 9 ½ ft. (with 5 ft. clearance) + (9 ft. isle)</b> |
| <b>WALKS &amp; SIDEWALKS</b>               |   |  |
| <b>Walk Width</b>                          | The minimum clear width of an accessible route shall be 36"   | <b>In front of the DCFS office; (concrete walkway) – 49" on</b>                                  |
| <b>Slope</b>                               | The slope shall not be greater than 5%. For every 1" rise, there must be a 20" run.   | <b>6.2% - 5.8% Change in elevation.<br/>3 degrees<br/>No sidewalk leading to front of Center</b> |
| <b>Walk Surface</b>                        | Walks shall be stable, firm, and slip-resistant   | <b>Concrete/Asphalt</b>  |
| <b>Changes in Level</b>                    | Changes in level up to ¼" may be vertical and without edge treatment. Changes in level between ¼" and ½" shall be beveled with a slope no greater than 1:2.   | <b>¼"</b>  |
| <b>Landing Size when Door Swings Out</b>   | When a walk leads to a door that swings out, there shall be a level and clear platform at the top, 5' x 5'. Allow for a 24" extension on the latch side of the door.  | <b>64" x 88"</b>   |
| <b>CURB RAMPS</b>                          |   |  |
| <b>Location</b>                            | Curb ramps shall be located wherever an accessible route crosses a curb   | <b>NA</b>  |

|  |   |           |
|--|---|-----------|
| <b>Width</b>   | Curb ramps shall be a minimum of 36' wide.  | <b>NA</b> |
| <b>Slope</b>   | For every 1" rise there must be at least 12" of run.  | <b>NA</b> |
| <b>Slope of Flared Sides</b>                           | If a curb ramp is located where pedestrians must walk across the ramp, or where it is not protected by handrails or guardrails, it shall have flared sides. Slope or flared sides shall not exceed 1" rise in 10".  | <b>NA</b> |
| <b>Detectable Warnings<br/>(Texture of Curb Ramps)</b> | A curb ramp shall have a detectable warning consisting of exposed aggregate concrete, parallel or diamond mesh pattern grooves, cushioned surfaces made of rubber or plastic, raised strips or grooves. The warning texture shall extend the full width and depth of the curb ramp, including any flares and shall contrast with that of the surrounding surface. | <b>NA</b> |
| <b>PEDESTRIAN RAMPS</b>                                |   |           |
| <b>Slope</b>   | The least possible slope shall be used for any ramp. It shall not have a slope greater than 1" rise in 12".   | <b>NA</b> |
| <b>Width</b>   | Pedestrian ramps shall be a minimum of 36" wide.  | <b>NA</b> |

|   |  |  |
|---|--|--|
| <b>Surface Texture</b>                  | Surfaces shall be stable, firm, and slip resistant.  | <b>NA</b>                                      |
| <b>Handrails</b>                        | If the ramp run has a rise greater than 6" (a run longer than 72"), then handrails shall be provided on both sides of the ramp between 34" – 38" above the ramp surface. The clear space between the handrail and the wall shall be 1 1/2".  | <b>NA</b>                                      |
| <b>Landings</b>                         | Landings shall be provided at the top and bottom of each ramp and each ramp run at intervals not exceeding 30' of run and at each change of direction.   | <b>NA</b>                                      |
| <b>Landing Dimensions</b>               | Landings shall be as wide as the ramp run leading to them and shall be a minimum length of 60" clear. If ramps change direction at landings, minimum landing size shall be 60" x 60".  | <b>NA</b>                                      |
| <b>ENTRANCES</b>                        |  |  |
| <b>Accessible Entrances</b>             | At least 50% of all public entrances to a building or facility shall be accessible. At least one must be a ground floor entrance. If direct access is provided from an enclosed parking garage to the building, at least one direct entrance from the garage to the building must be accessible. | <b>Front Entrance – Direct on Ground Floor</b> |
| <b>Revolving Doors &amp; Turnstiles</b> | Revolving doors or turnstiles shall not be the only means of passage at an accessible entrance or along an accessible route.   | <b>NA</b>                                      |
| <b>DOORS &amp; DOORWAYS</b>             |  |  |

|                                      |  |   |
|--------------------------------------|--|---|
| <b>Door Opening Force</b>            | Maximum force to operate doors shall not exceed 8.5 lbs. for exterior and 5 lbs for interior   | <p>[Doors are not automatic]</p> <p><b>Exterior entrance (right side) 9.1 lbs pull &amp; 25 lbs push</b></p> <p><b>Exterior entrance (left side) 8.5 lbs pull &amp; 30 lbs push</b></p> <p><b>Interior entrance (right) 13 lbs pull &amp; 17 lbs push</b></p> <p><b>Interior entrance (left) 13 lbs pull &amp; 15 lbs push</b></p> <p><b>Men's toilet room 9.3 lbs pull/11 lbs push</b></p> <p><b>Women's toilet room 17.1 pull/18 lbs push (Women's door jams significantly)</b></p> |
| <b>Width</b>                         | Doors shall have a minimum opening of 32" as measured between the face of the door and the opposite jamb with the door open 90 degrees.  | <b>32" Interior and Exterior</b>  |
| <b>Minimum Maneuvering Clearance</b> | Maneuvering clearance at doors where there is a front approach shall be level and clear and shall be at least 60" deep and 50" wide.   | <b>10 ft x 7'8"</b>   |
| <b>Door Hardware</b>                 | Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a design that is easy to grasp with one hand and does not require tight pinching or twisting of the wrist to operate. Lever-operated mechanisms push type mechanisms and U-shaped handles are acceptable designs. | <p><b>Handle In</b></p> <p><b>Push Bar Out</b></p>  |

|                                |   |   |
|--------------------------------|---|---|
| <b>Thresholds</b>              | Thresholds shall be no higher than 1/2".  | $\frac{1}{2}$ "   |
| <b>Height of Door Hardware</b> | Hand activated door opening hardware shall be no higher than 48" above the floor.   | <b>35" from floor to Door Handle<br/>40" from floor to Push Bar</b> |
| <b>COORIDORS&amp; AISLES</b>   |   |   |
| <b>Width of Corridors</b>      | Corridors shall be a minimum of 36" wide  | <b>12'9" x 12'5"</b>  |
| <b>Passing Space</b>           | If a corridor width is less than 60", wheelchair passing space of 60" x 60" shall be provided at reasonable intervals not to exceed 200'. A T intersection of two corridors is an acceptable passing space. | <b>12 ft clearance space between isles</b>                          |
| <b>RESTROOMS</b>               |   |   |
| <b>Width of Restroom Door</b>  | Doors shall have a minimum opening of 32" as measured between the face of the door and the opposite jamb with the door  | <b>Customer restrooms Single-User</b>                               |

|  |   |    |
|--|---|----|
|  | open 90 degrees.  |    |
| <b>Hardware on Restroom Door</b>                             | Door hardware must be easy to grasp with one hand and not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanism and U-shaped handles are acceptable designs.            | NA |
| <b>Number of Accessible Lavatories (Sinks) &amp; Mirrors</b> | If sinks and mirrors are provided, then at least one of each shall be accessible.   | NA |
| <b>Height of Accessible Sinks</b>                            | Sinks shall be mounted with the rim or counter surface no higher than 34". Knee clearance height 27" and depth a minimum 17".   | NA |
| <b>Clear Floor Space</b>                                     | Clear floor space of 30" x 48" shall be provided in front of the sink. Clear floor space may overlap that of the toilet   | NA |
| <b>Exposed Drain Pipes</b>                                   | Exposed hot water drain pipes under accessible sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under sinks.                                   | NA |
| <b>Dispensers, Hand Dryers, &amp; Towels</b>                 | For forward approach, the operable part must be no higher than 48". For side approach, the operable part must be no higher than 54". Operation of the mechanism must not require tight grasping, pinching, or twisting. | NA |
| <b>Faucets</b>   | Water faucets must be operable with one hand and shall not require tight grasping, tight pinching, or twisting of the wrist. If the valve is self closing, the water must flow for at least 10 seconds.                 | NA |
| <b>Mirrors</b>   | Mirrors shall be mounted with the bottom edge no higher than 40" from the floor.  | NA |
| <b>Toilet Stalls</b>   | If toilet stalls are provided in a room, then at least one must be accessible.  | NA |

|  |  |    |
|--|--|----|
| <b>Door to Toilet Stall</b>                    | Doors shall have a minimum opening of 32" as measured between the face of the door and the opposite jamb with the door open 90 degrees. The door shall not swing into the clear floor space of the accessible stall. | NA |
| <b>Toilet Stall Door Hardware</b>              | Door hardware must be easy to grasp with one hand and not require tight grasping, pinching, or twisting of the wrist to operate. Lever-operated mechanisms and U-shaped handles are acceptable designs.              | NA |
| <b>Clear Floor Space, Wall Mounted Toilet</b>  | The minimum clear floor space in a stall with a wall-mounted toilet shall be 56" in depth and 60" in width.  | NA |
| <b>Clear Floor Space, Floor Mounted Toilet</b> | The minimum clear floor space in a stall with a floor-mounted toilet shall be 59" in depth and 60" in width.   | NA |
| <b>Toilet Seat</b>                             | The height of the toilet seat must be between 17" and 19". Seats shall not be sprung to return to a lifted position.   | NA |
| <b>Grab Bars, Length &amp; Height</b>          | A 36" grab bar must be mounted on the wall behind the toilet. A 42" grab bar must be mounted on the nearest wall beside the toilet. Grab bars shall be mounted between 33" and 36" from the floor.                   | NA |
| <b>Grab Bar Diameter</b>                       | The diameter of the grab bar shall be between 1¼ and 1½". The space between the wall and the bar shall be 1 ½".  | NA |
| <b>Toilet Paper</b>                            | Receptacles and toilet paper dispensers shall be mounted at least 19" from the floor. Toilet paper dispensers that do not permit continuous paper flow are prohibited.   | NA |

|   |   |  |
|---|---|--|
| <b>Urinals</b>                                      | Where urinals are provided, at least one must have an elongated rim at a maximum height of 17" above the floor.   | <b>NA</b>  |
| <b>Urinal Clear Floor Space</b>                     | Minimum clear floor space of 30" by 48" shall be provided in front of the accessible urinal to allow forward approach.  | <b>NA</b>  |
| <b>Urinal Flush Control</b>                         | Urinal flush control shall be mounted no higher than 44" above the floor.   | <b>NA</b>  |
| <b>Single User Toilet Room</b>                      |   |  |
| <b>Door Width</b>                                   | Doors shall have a minimum opening of 32" as measured between the face of the door and the opposite jamb with the door open 90 degrees.   | <b>Men's 33 ½" / Women's 33 1/3"</b>   |
| <b>Door Hardware</b>                                | Door hardware must be easy to grasp with one hand and not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanism and U-shaped handles are acceptable designs.                                | <b>Lever</b>   |
| <b>Clear Floor Space, Front Approach</b>            | The minimum clear floor space shall be 48" in width and 66" in length.  | <b>Men's 9 ft x 14 ft floor space<br/>Front approach to toilet is 55"</b><br><br><b>Women's 9 ft x 14 ft floor space<br/>Front approach to toilet is 55 ½"</b> |
| <b>Clear Floor Space, Side Approach</b>             | The minimum clear floor space shall be 48" in width and 56" in length.  | <b>Men's 8' x 6'10"</b><br><b>Women's 7'11 x 6'10½"</b>  |
| <b>Clear Floor Space, Side &amp; Front Approach</b> | The minimum clear floor space shall be 60" in width and 56" in length.  | <b>NA</b>  |
| <b>Doors That Swing into Clear Floor Space</b>      | It is preferred that doors not swing into the clear floor space required for any fixture. However, in single user toilet rooms only, doors may swing into the clear floor space required for any fixture if sufficient maneuvering space is | <b>OK</b>  |

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|  | provided within the room for a person using a wheelchair to enter and close the door, use the fixtures, reopen the door, and exit.  |  |
| <b>Toilet Seat</b>                           | The height of the toilet seat must be between 17" and 19". Seats shall not be sprung to return to a lifted position.  | <b>Men's 19" / Women's 19½"</b>  |
| <b>Grab Bars, Length &amp; Height</b>        | A 36" grab bar must be mounted on the wall behind the toilet. A 42" grab bar must be mounted on the nearest wall beside the toilet. Grab bars shall be mounted between 33" and 36" from the floor.                      | <b>Men's Grab Bars 34½" from floor</b><br><b>Men's Grab Bar (Side) 52 ½" long</b><br><b>Men's Grab Bar (Back) 36" long</b><br><br><b>Women's Grab Bars 34½" from floor</b><br><b>Women's Grab Bar (Side) 52 ½" long</b><br><b>Women's Grab Bar (Back) 36" long</b> |
| <b>Grab Bar Diameter</b>                     | The diameter of the grab bar shall be between 1¼ and 1½". The space between the wall and the bar shall be 1 ½".   | <b>Men's and Women's Grab Bar Diameter: 1½" &amp; 1 ¾" from wall</b>   |
| <b>Toilet Paper</b>                          | Receptacles and toilet paper dispensers shall be mounted at least 19" from the floor. Toilet paper dispensers that do not permit continuous paper flow are prohibited.  | <b>Men's and Women's 24 ½" from floor &amp; 2" from toilet</b>   |
| <b>Height of Accessible Sinks</b>            | Sinks shall be mounted with the rim or counter surface no higher than 34". Knee clearance height must be 27" and depth must be a minimum of 17".  | <b>Men's and women's 31 ½" Counter Surface</b><br><b>28 ½" clearance</b><br><b>17 ½" depth</b>   |
| <b>Clear Floor Space</b>                     | Clear floor space of 30" x 48" shall be provided in front of the sink. Clear floor space may overlap with that of the toilet.   | <b>65 ½" x 8 ft</b>  |
| <b>Exposed Drain Pipes</b>                   | Exposed hot water drain pipes under accessible sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under sinks.                                   | <b>Slightly exposed drain pipes under the sink</b>   |
| <b>Dispensers, Hand Dryers, &amp; Towels</b> | For forward approach, the operable part must be no higher than 48". For side approach, the operable part must be no higher than 54". Operation of the mechanism must not require tight grasping, pinching, or twisting. | <b>Soap Dispenser: Men 39 ½" Women 45½"</b>  |
| <b>Faucets</b>                               | Water faucets must be operable with one hand and shall not require tight grasping,  | <b>Men's &amp; Women's Faucets have continuous flow.</b>   |

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|  | tight pinching, or twisting of the wrist. If the valve is self closing, the water must flow for at least 10 seconds.   |   |
| <b>Mirrors</b>                               | Mirrors shall be mounted with the bottom edge no higher than 40" from the floor.   | <b>Men's Mirror: 40"</b><br><b>Women's Mirror: 35½"</b>   |
| <b>WATER FOUNTAINS</b>                       |  |   |
| <b>Spout Location and Height</b>             | The spout shall be at the front of the unit and direct the water flow parallel to the front of the unit. The spout shall be no higher than 36" above the ground.                                 | <b>Spout is at the front of the unit and has direct water flow parallel to the front of the unit: Spout: 35" above ground</b> |
| <b>Type of Controls</b>                      | Controls shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than five pounds. | <b>Push Control Bar: 29" above ground</b><br><b>Push force: 3.5 lbs</b>   |
| <b>Clear Floor Space</b>                     | All units must have a clear floor space of 30" x 48"   | <b>7'2" x 14'7"</b>   |
| <b>Water Fountain Depth &amp; Knee Space</b> | Wall mounted fountains shall be a minimum of 17" – 19" in depth. Clear and unobstructed space, if provided under the fountain, shall be 27" high and 17" – 19" deep.                             | <b>Knee clearance: 8"</b><br><b>Depth: 19"</b><br><b>Height: 27"</b>  |
| <b>Public Telephones</b>                     |  |   |
| <b>Number of Accessible Telephones</b>       | Where public telephones are provided, at least one per floor or one per bank shall be accessible. (A bank is 2 or more phones, often installed as a unit)  | <b>(1) Phone available in closed Interview Room</b>   |
| <b>Height of Public Telephones</b>           | If space allows for only forward approach, the highest operable part of the telephone shall be no higher than 48". For side approach 54" is permitted.   | <b>Forward approach 34"</b>   |
| <b>Knee space Below Telephone</b>            | A 27" unobstructed knee space shall be available under any shelf, phone directory, or protruding object.   | <b>27 ¾" unobstructed space</b>   |

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| <b>Hearing Aid Compatible and Volume Control</b> | At least one phone per floor or one per bank of public telephones shall be equipped with volume control and identified with the appropriate signage.   | <b>Phones have volume control with appropriate signage (no Braille)</b>   |
| <b>TTYs</b>                                      | Wherever a telephone is available for public use, equivalent facilitation in the form of a TTY should be available.  | <b>No TTY available</b>   |
| <b>Signs and Identification</b>                  |  |   |
| <b>Signs</b>                                     | <p>The international symbol of accessibility shall be used at the following locations:</p> <ul style="list-style-type: none"> <li>• Passenger loading zones</li> <li>• Accessible entrances (where all entrances are not accessible)</li> <li>• Accessible toilet rooms</li> <li>• Public Telephones</li> </ul>  | <p><b>No signs for passenger boarding or accessible signage at entrances.</b></p> <p><b>Toilet rooms have international symbol.</b></p> <p><b>No public phones available.</b></p>                                       |
| <b>Permanent Room Signage</b>                    | Permanent room signage shall be placed along the latch side of the door and mounted 5' above the floor. Letters and numerals shall be raised 1/32" and shall be accompanied with Grade 2 Braille. Mounting location for such signs shall be so that a person may approach within three inches of signage without encountering protruding objects or standing within the swing of a door. | <p><b>Permanent rooms not appropriately signed.</b></p> <p><b>Public rest room sign in hall is 69" above ground.</b></p> <p><b>Bathroom sign on doors are 62" above ground; Braille marker is 54" above ground.</b></p> |
| <b>Tables, &amp; Work Surfaces</b>               |  |   |
| <b>Clear Floor Space</b>                         | Where fixed or built-in seating, tables, or work surfaces are provided, at least 5% or a minimum of one, whichever is greater, shall have clear floor space of 30" x 48" which can overlap knee space up to 19".   | <b>Floor clearance space much greater than 30" x 48". Very large open area.</b>   |
| <b>Knee Clearance</b>                            | Accessible seating shall have a knee space at least 27" high, 30" wide and 19" deep.   | <p><b>IDES Skills Match stations – 28 ½" knee clearance</b></p> <p><b>Public Access seating at (4) 30" round tables with 25 ½" knee clearance height (Inadequate knee clearance)</b></p>                                |

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| <b>Height of Tables or Counters</b> | The tops of accessible tables and counters shall be from 28" – 34" above the floor.  | <b>Workstation counter tops are not accessible (19" above ground)</b>   |
| <b>Additional Features</b>          |  |   |
| <b>Alarms</b>                       | Where emergency alarms are provided or required by an applicable State or local building code, life safety code or fire protection regulation, such systems shall be both audible and visual. Visual alarms shall be arranged so that the flashing beam can be seen from all common areas  | <b>10 Xenon fire lights (visual)</b><br><b>15 Audible Alarm (db)</b><br><b>4 visual manual pull stations</b><br><b>6 ABC Fire Extinguishers</b> |
| <b>Protruding Objects</b>           | All accessible paths of travel/routes through public areas must be kept free of objects protruding more than 4" from the wall at heights between 27" and 80" (cane detectable).  | <b>Fire extinguisher – 6" protruding from T intersection near the utility closet</b>  |
| <b>Controls</b>                     | All controls that are available for use by the public, (including electrical, mechanical, window, cabinet, game, and self-service controls) must be located at an accessible height – 54" for a side approach and 48" a forward approach. The minimum reachable height is 15 inches. Controls must be operable with a closed fist. | <b>NA</b>   |
| <b>INFORMATION ACCESS</b>           |  |   |
| <b>ALTERNATE FORMATS</b>            | The One-Stop center has basic orientation materials in alternate formats large print, Braille, audio-tape, text on computer disk, etc.) and has also identified resources to quickly obtain other materials in alternate formats   | <b>No alternate formats readily available. Still needing audio and Braille print for orientation materials.</b>                                 |
| <b>Printed Materials</b>            | Printed materials, including those on bulletin boards, are available in large print (18 to 24 point font) upon request.  | <b>Closed Caption for the hearing impaired available on Televisions- Photo Copiers has enlargement capabilities</b>                             |
|                                     | Printed materials are available in Braille upon request.   | <b>Braille not available; Department of Rehabilitative Services will facilitate Braille printing</b>  |

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|                                    | Printed materials are available in accessible electronic format (ASCII text) upon request.                | <b>Available thru “Save As” function on computer (3.5” disc)<br/>Scanner available to scan into computer</b>                |
|                                    | Printed materials are available in audio format upon request  | <b>None currently available.<br/>Management indicated a willingness to dedicate staff to record information on request.</b> |
| <b>Audio &amp; Video Materials</b> | Text transcripts (printed or electronic) are available for audio materials.                               | <b>Text Transcripts not available; Meeting minutes are transcribed in handwritten form.</b>                                 |
|                                    | Video Materials have open captions (or closed captions if compatible equipment is available)              | <b>Video materials are not all captioned.<br/>Captioning is a requirement for all future purchases.</b>                     |
|                                    | Video materials have descriptive audio (narrated descriptions of actors, actions, and scenes)             | <b>Video materials are not descriptive audio equipped.</b>  |
| <b>AUDIO AND VIDEO EQUIPMENT</b>   | All television displays 13 inches and larger are equipped with closed caption decoders.                   | <b>Not visible to public; 20” TV locked in cabinet in a conference room.</b>  |
| <b>A/V (Cont)</b>                  | Controls are clearly and understandably labeled (including large print and Braille labels as appropriate) | <b>Controls are not adequately labeled; No large print or Braille labels are available on AV controls.</b>                  |
|                                    | Controls can be operated with one hand without tight grasping, pinching, or twisting of the wrist.        | <b>Most controls for AV are push button controls.</b>   |
|                                    | Volume settings are user-adjustable   | <b>Volume settings were push button designed.</b>   |
|                                    | Players have headphone jacks for users of assistive listening devices                                     | <b>No audio players are present in the resource area.</b>   |
|                                    | Headphones are available  | <b>Headphones are available for public use in the resource room.</b>  |

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|                                    | Players are located on work surfaces between 28" to 34" above the floor with 27" unobstructed knee clearance   | <b>No audio players are present in the resource area.</b>  |
|                                    | Instructions for operation of players are available in alternate formats   | <b>Instructions are not available in alternate formats.</b>  |
| <b>Sign Language Interpreters</b>  | The One-Stop Center has identified a source for certified sign language interpreters, and can respond quickly to interpreter requests  | <b>ORS and PACE identified as resource for providing ASL Interpreters</b>                              |
| <b>OFFICE EQUIPMENT</b>            | Any office equipment, such as printers, faxes, and copiers, that is available for use by the public should be accessible to and usable by individuals with disabilities  | <b>Printer, copier, and fax all available for customers use</b>  |
| <b>Controls</b>                    | Controls are located no higher than 48" inches above the floor.  | <b>Printer 42 ½"; Copier 42"</b>   |
|                                    | Controls can be operated with one hand, without tight grasping, pinching or twisting of the wrist.   | <b>Office equipment (printer, copier, and fax) is push button designed.</b>                            |
|                                    | Controls can be identified by touch.   | <b>Braille (touch sensory identification) is not available on office equipment operating controls.</b> |
|                                    | The status of locking or toggle controls can be identified by sight and by touch or sound.   | <b>No locking or toggle controls were available.</b>   |
|                                    | If important information is presented with sound, (with adjustable volume) it is also available visually.  | <b>Printer, copier, and fax have visible information.</b>  |
|                                    | If important information is displayed on a screen, it can be read by a person in a seated position   | <b>Information can be read on the resource room printer, copier, and fax in a seated position.</b>     |
|                                    | Users can confirm their selections, (e.g. number of copies) before the operation begins.   | <b>Users can confirm selections before operation of equipment begins.</b>                              |
| <b>Web-Site</b>                    | All web-sites funded or supported by IETC's should be fully accessible to people with disabilities and conform to the requirements of Section 508 of the Rehab Act ( <a href="http://www.section508.gov/">http://www.section508.gov/</a> ) | <b><a href="http://www.dacc.cc./wib/flash/home.htm">www.dacc.cc./wib/flash/home.htm</a></b>            |
| <b>WORK STATIONS AND EQUIPMENT</b> |  |  |

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| <b>Large Monitor</b>                       | There is at least one 19" – 21" monitor with a movable mounting arm that provides increased character size and clarity available.  | <b>20" Monitor is available in a storage cabinet.</b>   |
| <b>Screen Enlargement</b>                  | There is at least one computer equipped with screen enlargement capabilities that enable the user to enlarge the print on a monitor's screen   | <b>One computer is equipped with screen enlargement.</b>  |
| <b>Voice Output Capability</b>             | There is at least one computer that can "read" text on the monitor and convert the text into voice output. This computer should be equipped with a headphone jack and headphones.            | <b>No computer can readily read text on the monitor and convert the text to voice output. Additional software is necessary for such applications.</b> |
| <b>Flatbed Scanner</b>                     | There is a scanner that can convert a paper document into electronic format (useful to people who access information through voice output or Braille)  | <b>Flatbed scanner is available in the resource room.</b>   |
| <b>Large Keyboard Caps</b>                 | There is at least one computer equipped with key markings that enlarge letters and numbers on the keyboard   | <b>One computer is equipped with enlarged key cap markings.</b>   |
| <b>Trackball Mouse</b>                     | There is at least one computer equipped with a trackball mouse as an alternative to the standard mouse.  | <b>One computer is equipped with a trackball mouse.</b>   |
| <b>Braille Printer</b>                     | The Center has a Braille printer for use by customers and staff.   | <b>No Braille Printer is available at IETC.</b>   |
| <b>Portable Assistive Listening Device</b> | There is at least one portable assistive listening device available for individuals with hearing loss. (These devices increase the loudness of the speaker while reducing background noise.) | <b>There is no portable assistive listening device available.</b>   |
| <b>Height Adjustable Tables</b>            | Workstations and worktables include height-adjustable tables for use by wheelchair users.  | <b>Height adjustable table not available on workstations and worktables. Workstations have a knee clearance of 28½" and counter height of 30".</b>    |
| <b>POLICIES</b>                            |  |   |
| <b>Registration &amp; Orientation</b>      | If a person needs assistance in filling out registration or intake forms, this is done in a private room.  | <b>Persons needing assistance may contact the resource room operator</b>  |
|  | Clearly understood procedures for requesting reasonable accommodations and modifications are included in writing   | <b>Each orientation for new employees and enrollees contains information that is verbally reviewed by IETC staff regarding</b>                        |

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|                                | and reviewed verbally during orientation.  | <b>reasonable accommodation requests.</b>   |
|                                | A list of the One-Stop's auxiliary aids and services for communication, assistive technology devices, and material in accessible formats is provided in writing and verbally during orientation          | <b>The IETC does not have a list available of the auxiliary aids and services for communication, assistive technology devices. Material in accessible formats in writing was not available (Braille).</b> |
|                                | As required by WIA regulations, every orientation session includes a presentation of customer's rights to nondiscrimination and equal opportunity, including the right to file a complaint.              | IETC staff provides the rights to nondiscrimination and equal opportunity, including the right to file a complaint during the customer's orientation session.   |
| <b>Service Delivery</b>        | People with disabilities are served in integrated settings and participate in the programs and services of the One-Stop Center alongside people without disabilities.                                    | <b>The resource room includes an integrated setting to help those with disabilities alongside those without.</b>  |
|                                | If permissible separate programs exist at the One-stop Center, people with disabilities are not required to participate in such programs   | <b>Separate programs do not exist at the One-Stop Center.</b>   |
|                                | People with disabilities have access to the full range of core, intensive, and training services available to all customers, and are not served exclusively via services from Vocational Rehabilitation. | <b>One-Stop customers have equal access to all core, intensive, and training services offered.</b>  |
|                                | All customers are routinely offered the option of meeting with staff in private.   | <b>All customers meet with IETC in private during the applicant and enrollment process.</b>   |
|                                | Information is presented in a way that is understandable to people who have limited or no reading skills   | <b>All information that is written is also reviewed verbally during the applicant and enrollment process.</b>   |
| <b>Service Delivery (cont)</b> | Information that is presented orally is also available in writing for people who are deaf or hard of hearing, and for people whose learning style requires reinforcement of items in writing.            | <b>All information that is presented orally is also in written format (except Braille).</b>   |
|                                | Services are designed so that individuals  | <b>The Resource Room Operator assists all individuals who need help with the</b>  |

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|                               | who are not knowledgeable, comfortable with, or able to use electronic technology (i.e., computers) can fully benefit from One-Stop services.   | <b>available technology at the IETC.</b>   |
|                               | Quiet workspace is available for people requiring such accommodations to thoroughly read and comprehend materials.  | <b>Offices are available with closed doors to provide persons requiring</b>  |
| <b>General Communication</b>  | The One-Stop center has taken appropriate steps to ensure that communication with customers and potential customers with disabilities is as effective as communication with other customers.  | <b>Vermillion County IETC needs to continue to make improvements to ensure that communication with customers and potential customers with disabilities is as effective as communication with other customers</b> |
|                               | One-Stop staff regularly informs all customers that communications aids and services are provided upon request.   | <b>Vermillion County IETC needs to post information and become more knowledgeable regarding communications aids and services that are available.</b>   |
|                               | The One-Stop Center has a procedure for responding to requests for auxiliary aids and services. This procedure includes a mechanism for determining that if an aid or service must be substituted for one that was requested, the aid used was equally effective. | <b>Staff will develop and include a procedure for responding to requests for auxiliary aids and services.</b>  |
|                               | The One-Stop Center has identified a source for certified sign language interpreters, and can respond quickly to such requests.   | <b>The One-Stop Center needs to identify various sources for certified sign language interpreters. Staff needs to be informed on how to use these services when needed.</b>                                      |
| <b>Marketing and Outreach</b> | Marketing materials mention people with disabilities as one of the groups that One-Stop centers serve.  | <b>Marketing materials that mention people with disabilities as one of the groups that are served need to be more widespread. Job Accommodation Network (JAN) information is posted.</b>                         |
|                               | Pictures and graphics in marketing materials include positive images of people with disabilities receiving services with other customers.   | <b>EAP and JAN materials include positive images of people with disabilities receiving services with other customers.</b>  |
|                               | A list of the One-Stop Center's auxiliary aids and services for communication, assistive technology, and material in accessible formats are provided as part of the outreach materials.   | <b>There is currently no list of auxiliary aids and services in accessible formats provided as part of the outreach materials.</b>   |
|                               | The One-Stop center indicates that it is an "equal opportunity employer   | <b>Materials include the appropriate captions; however, no TTY number is</b>   |

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|  | /program” and that “auxiliary aids and services are available upon request to individuals with disabilities” in recruitment brochures and other materials. These materials also indicate the telephone number of the Center’s TTY.  | <b>listed on the material.</b>   |
| <b>Access to Transportation</b>                          | If the service delivery area has public transportation, the One-stop center is in a location that provides optimal public transportation access so that people with disabilities and others who do not drive can easily reach the center.   | <b>Fixed route Public Transportation stops at door – Route stops every 30 minutes until 5:00 pm.</b> |
|  | If the service delivery area is not served by public transportation, the One-stop Center has taken steps to ensure that individuals, who do not drive, including people with disabilities, have access to the full range of One-stop services. This can include developing transportation options and resources, delivering services in satellite locations, etc.   |  |
| <b>Additional Marketing and Outreach Suggestions</b>     | <p>As part of its efforts to provide universal accessibility, the One-Stop center should outreach to people with disabilities, as required by WIA regulations. This includes such activities as:</p> <ul style="list-style-type: none"> <li>• Advertising in media that targets people with disabilities</li> <li>• Sending notices about One-stop activities to community groups, organizations, and associations that people with disabilities participate in.</li> <li>• Consulting with community groups, organizations, and associations about ways in which the One-Stop Center can improve its outreach and services to people with disabilities.</li> </ul> <p>Presentations to the general public include a discussion of customer’s rights concerning nondiscrimination and equal opportunity as required by WIA regulations.</p> |  |
| <b>Notice on Equal Opportunity and Nondiscrimination</b> | <p>Posters complying with the required wording in the nondiscrimination and equal opportunity regulations, and including the contact information of the Equal Opportunity Officer shall be posted in public areas and:</p> <ul style="list-style-type: none"> <li>• Included in orientation materials made available to every customer</li> <li>• Included in handbooks and manuals</li> <li>• Included in marketing materials</li> <li>• Disseminated in internal communications</li> <li>• Placed in each customers file</li> <li>• Provided in accessible formats</li> <li>• Provided to applicants for employment and employees</li> <li>• Provided to unions or professional organizations that hold collective bargaining or professional agreements with the One-Stop</li> </ul>   |  |

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|  | <ul style="list-style-type: none"><li>• Provided to sub-recipients or sub-contractors that receive WIA Title I funds from the One-Stop</li></ul> |
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### Appendix III



1. No sidewalk on the side of the street closest to the building by the front door.





2. Both of the front door push/pull range from 9.1 to 30 lbs push/pull.



Pull force ranges from 9.3 lbs in the men's restroom to 17.1 lbs in the women's restroom.



Push force in the men's restroom was 11 lbs. and the women's restroom was 18 lbs.



Public rest room not appropriately signed; should be 5' from the floor



Work Station counter tops are not accessible; they should be at least 28" from the ground.



Protruding Objects – Fire extinguisher